

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

APOLLO ENTERPRISE IMAGING CORP.,)	
)	
Plaintiff,)	
)	
v.)	1:19-cv-1603 (LMB/MSN)
)	
)	
JAMES MICHAEL CONYERS,)	
)	
Defendant.)	

THIS MATTER is before the court on the joint Motion for Entry of Consent Judgment and Permanent Injunction. Having considered the joint motion and reviewed the pleadings, the court enters the following Order.

ORDER

IT IS ORDERED that the parties' joint Motion for Entry of Consent Judgment and Permanent Injunction is GRANTED.

JUDGMENT and PERMANENT INJUNCTION

It is hereby ORDERED as follows:

1. To the extent Defendant has not already done so pursuant to this Court's Preliminary Injunction Order (Doc. No. 9) Defendant must immediately:
 - (a) identify to plaintiff's counsel any and all devices, cloud storage, or other storage media in the possession or control of Conyers or any party in active concert or participation with him where he has stored or caused to be stored any Apollo Materials; and

(b) return to plaintiff all originals and copies of all files, devices, electronically stored information, and/or documents that contain or relate to Apollo's confidential, proprietary and trade secret information, including, but not limited to, as contained in:

Device ID	Description	Serial/UID
USB001	AI Mass Storage USB Device	a&346d5260
USB002	General UDisk USB Device	b&34fd5dfb
USB003	Generic Flash Disk USB Device	47349433
USB004	Memorex TD Classic 003B USB Device	077602170A30
USB005	Memorex TD Classic 003B USB Device	07760B16146B
USB006	SanDisk Cruzer Mini USB Device	20043513030a7fd31f70
USB007	Seagate BUP Slim USB Device	00000000NABD3KR3
USB008	Seagate BUP Slim BK USB Device	NA9MA3MV
USB009	Western Digital My Passport 2626	575846314131395046353458
USB010	Kingston DataTraveler 3.0 USB Device	408D5CBFD2EDB23089A901C5
USB011	Western Digital My Passport	SN:575845314132315334383833
USB012	Dell Portable Disk	SN: NA53Z080
USB013	Kingston DT 101 G2	SN:001cc0c60e20cbb1242923c9
USB014	Western Digital My Passport 0740	SN: 575844314539314c59544a35
USB015	Kingston Data Traveler 2.0	SN: 1c6f6581fdf7ed91d90e00c0
USB016	WD My Passport 07A8	SN:575843314139323438333939
USB017	Generic External Drive	SN: d56blacl

USB018	Generic External Drive	SN: 7ce4032e
USB019	Generic External Drive	SN: 0064e1f6
USB020	Generic External Drive	Volume Serial: da95-4ec4

2. To the extent that any of the devices listed above are no longer in Defendant's possession and to the extent that Defendant has not already done so, he must advise Plaintiffs by written affidavit, of what happened to them or where they are. He must also advise whether he copied or downloaded Apollo Materials anywhere else, including but not limited to any other servers, cloud-based storage systems, devices, or hard copies. Conyers must also, to the extent that he has not already done so under oath, advise whether he has shared any Apollo Materials with any third parties, including, but not limited to, his current employer.

3. Conyers, and all parties in active concert or participation with him who have actual notice of this Order be and are ENJOINED from:

- a) violating the Confidentiality and Inventions Agreement Conyers entered into with Apollo;
- b) accessing, using, copying, printing, disseminating, or disclosing any of Apollo's confidential, proprietary and trade secret information;
- c) directly or indirectly soliciting the business of any of Apollo's joint venture or collaborative research partners, clients and prospective clients;
- d) persuading any of Apollo's clients to cease doing business with Apollo and/or persuading any of Apollo's clients to conduct business with another business competitive with Apollo; and,

e) taking any action that would destroy any evidence relevant to this matter, including any metadata.

4. All parties shall be subject to the jurisdiction of this Court in connection with the enforcement of this Consent Judgment and Permanent Injunction.

5. This Consent Judgment and Permanent Injunction shall be binding upon and inure to the benefit of the parties hereto and their successors and assigns. The parties acknowledge, and the Court finds, that this Consent Judgment and Permanent Injunction is intended to be the final order disposing of all issues in this matter, except as additional orders or rulings may be necessary to enforce this Consent Judgment and Permanent Injunction.

6. Any claims raised in this litigation are rendered moot, are hereby dismissed, and the Court considers this action concluded, and the Court will take no further action in this matter unless requested to do so by any party to enforce this Consent Judgment and Permanent Injunction.

7. The Court shall retain jurisdiction over this action for the purpose of enforcing the Consent Judgment and Permanent Injunction hereby entered.

8. The Clerk of Court is instructed to administratively close this action.

Entered this 5th day of June, 2020
Alexandria, Virginia

/s/ LMB
Leonie M. Brinkema
United States District Judge